



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

August 7, 2018

Dr. Connie B. Welch  
Representative for New Avon LLC  
c/o Toxcel  
Toxicology & Regulatory Affairs  
7140 Heritage Village Plaza  
Gainesville, VA 20155

Subject: Label Amendment – Label amendment to add Powassan Encephalitis to the label.  
Product Name: Avon Skin-So-Soft SSS Bug Guard Plus Picaridin Insect Repellent Spray  
EPA Registration Number: 806-31  
Application Date: September 26, 2017  
Decision Number: 534590

Dear Dr. Welch:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Jennifer Gaines at 703-305-5967 or via email at [gaines.jennifer@epa.gov](mailto:gaines.jennifer@epa.gov).

Sincerely,



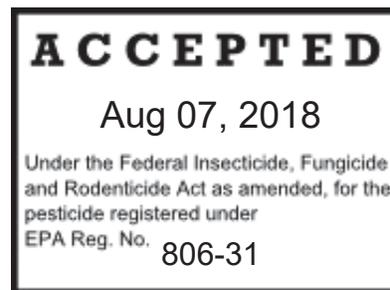
for

Elizabeth Fertich, Product Manager 4  
Invertebrate & Vertebrate Branch 1  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

FRONT OF CONTAINER:

AVON  
SKIN-SO-SOFT  
S  
S  
S  
BUG GUARD PLUS  
PICARIDIN  
INSECT REPELLENT SPRAY



**[ALTERNATE BRAND NAME #1:]**

AVON  
SKIN-SO-SOFT  
S  
S  
S  
PICARIDIN  
INSECT REPELLENT SPRAY

**[ALTERNATE BRAND NAME#2:]**

AVON  
BUG GUARD PLUS  
PICARIDIN  
INSECT REPELLENT SPRAY

**[ALTERNATE BRAND NAME#3:]**

AVON  
SKIN-SO-SOFT  
S  
S  
S  
BUG GUARD PLUS  
PICARIDIN  
DEER TICK REPELLENT SPRAY

KEEP OUT OF REACH OF CHILDREN  
WARNING

See back panel for additional precautionary statements

ACTIVE INGREDIENT:

Picaridin 10.0%

OTHER INGREDIENTS: 90.0%

TOTAL: 100.0%

XX FL. OZ. (YY ml)

[Text within brackets is optional and may appear on the back of container label]

**BACK OF CONTAINER:**

**PRECAUTIONARY STATEMENTS:** Hazards to Humans. Warning: Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Discontinue use and consult a doctor if irritation or rash occurs.

<b>FIRST AID</b>	
If in eyes:	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to by a poison control center or doctor.</li> <li>• Do not give anything to an unconscious person.</li> </ul>
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-FOR-AVON for emergency medical treatment information.	

**PHYSICAL HAZARDS** - Flammable. Keep away from heat and open flame.

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label. Hold container 6 to 8 inches from skin and spray with a slow sweeping motion liberally and evenly. Do not spray in enclosed areas. Do not apply under clothing, on cuts, wounds, freshly shaved, excessively sunburned or irritated skin. **TO APPLY TO FACE:** Spray palm of hand and rub on, avoiding the eye and lip area. Use sparingly around ears. Use just enough repellent to cover exposed skin. Avoid over application of product. Do not allow children to handle this product. When applying to children, apply to your own hands and then put it on the child. Do not apply directly to children's hands. **FOR CONTINUED PROTECTION** from deer ticks reapply after 12 hours, and for mosquitoes reapply after 8 hours, and for gnats, no-seeums, sand flies and biting midges reapply after 6 hours.

<b>STORAGE AND DISPOSAL:</b>
<b>PESTICIDE STORAGE:</b> Store in cool, dry place away from heat or flame. <b>PESTICIDE DISPOSAL &amp; CONTAINER HANDLING:</b> <b>If empty:</b> Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. <b>If partly filled:</b> Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

To order, see an Avon Representative, or call 1-800-FOR-AVON. [www.avon.com](http://www.avon.com)  
 EPA Reg. No. 806-31 EPA Est. No. 806-OH-001  
 [Distributed by] NEW AVON LLC  
 1251 AVE. OF THE AMERICAS, NY, NY 10020  
 © AVON 200X [– ALL RIGHTS RESERVED]

**Bottom of Container:**

Day Lot Code  
 Exp. Year / Month

**[Note to reviewer: The following statements, including those within brackets, are optional AND may appear on the product label AND / OR in marketing collateral materials AND the use of punctuation marks for each statement is optional]**

Contains Vitamin E

With Vitamin E

Vitamin E

Contains Aloe

With Aloe

Aloe

Contains Vitamin E & Aloe

[Contains] Bayrepel®

Bayrepel® is a registered trademark of Lanxess

U.S. Patent Nos. 6,719,959 and 7,150,878

Gentle Breeze™ Scent

Gentle Breeze™

Pleasantly scented

Easy to apply

Sprays at any angle

Light feeling spray

Non-oily

Not oily

Non-greasy

Not greasy

Light feel

Quick drying

Fast drying

Will not harm most plastics or synthetic fabrics

May damage painted or varnished surfaces, including nail polish

For active [family] lifestyles

Protection against mosquitoes

Protection against deer ticks

Protection against mosquitoes and deer ticks

Suitable for the [entire] [whole] family

Provides the whole family with an effective [broad-spectrum] outdoor insect repellent

Protection for the [entire] [whole] family

Strong protection for the [entire] [whole] family

[Strong] [Dependable] Protection

Effective, dependable protection

Provides strong and dependable [protection] [repellency]

[Repellency -] Avon's formula [with Picaridin] provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

[Repellency -] Patented technology that provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

[Repellency -] Avon's formula [with Picaridin] provides strong and dependable [repellency] [protection] against [mosquitoes] [deer ticks]

Patented technology

Patented enhanced duration technology

Patented time-release technology

Patented time-release technology

Time-release formula

Time-release

Patented controlled-release technology

Controlled-release formula

Controlled-release

Repels [listed insects] [mosquitoes] [deer ticks] [mosquitoes and deer ticks] [gnats, no-seeums, sand flies and biting midges]

Strong and long-lasting [repellency] [protection] against mosquitoes [for] [up to] 8 hours

Strong and long-lasting [repellency] [protection] against deer ticks [for] [up to] 12 hours

Strong and long-lasting [repellency] [protection] against mosquitoes [for] [up to] 8 hours and deer ticks [for] [up to] 12 hours

Strong [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

[Repellency] [protection] against deer ticks for up to 12 hours, mosquitoes for up to 8 hours, gnats, no-seeums, sand flies and biting midges for up to 6 hours

Strong [repellency] [protection] against deer ticks for up to 12 hours, mosquitoes for up to 8 hours, gnats, no-seeums, sand flies and biting midges for up to 6 hours

Repels gnats, no-seeums, sand flies and biting midges

Repels gnats, no-seeums, sand flies and biting midges up to 6 hours

Repels gnats, no-seeums, sand flies and biting midges for 6 hours

Strong [repellency] [protection] against mosquitoes

[Repellency] [protection] against mosquitoes

Prevents mosquitoes from biting [for 8 hours]

Strong [repellency] [protection] against deer ticks

[Repellency] [protection] against deer ticks

Strong [repellency] [protection] against mosquitoes and deer ticks

Repels mosquitoes

Repels mosquitoes up to 8 hours

Repels mosquitoes for 8 hours

Repels mosquitoes that may carry/transmit West Nile Virus up to 8 hours

Repels mosquitoes that may carry/transmit West Nile Virus for 8 hours

Repels mosquitoes that may carry/transmit West Nile Virus

Repels deer ticks

Repels deer ticks up to 12 hours

Repels deer ticks for 12 hours

Repels deer ticks that may carry/transmit [Lyme Disease] [and] [Powassan Encephalitis] up to 12 hours

Repels deer ticks that may carry/transmit [Lyme Disease] [and] [Powassan Encephalitis] for 12 hours

Repels deer ticks that may carry/transmit [Lyme Disease] [and] [Powassan Encephalitis]

Made in the USA

Low odor formula

Effective, dependable insect repellency

Non-sticky

Quick and even coverage

Sprays evenly and consistently

Protection for the entire family

Smart (dependable) protection for the entire family

Effective protection you can count on from listed insects (including mosquitos and ticks)

Proven shield against mosquitos and deer ticks

Fights off mosquitos and unwanted listed insects

Easy on skin, tough on listed bugs

The right protection for your family

Stay protected for 8 hours from mosquitos and for 12 hours from deer ticks

For hiking, fishing, hunting, camping and backpacking

Suitable for outdoor activities

Perfect for hiking and other outdoor sports